

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff,)	Case No. 1:18-cv-08175-ER
)	
v.)	
)	
BARRY C. HONIG,)	DECLARATION OF RANDALL R. LEE
<i>et al.</i> ,)	IN SUPPORT OF DEFENDANT
)	ROBERT LADD'S MOTION TO
Defendants.)	COMPEL A RULE 30(B)(6)
)	DEPOSITION

I, Randall R. Lee, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California, and I am admitted *pro hac vice* to this Court for the above-captioned matter. I am a partner with the law firm Cooley LLP, counsel for Defendant Robert Ladd in the above-captioned matter.

2. I respectfully submit this declaration in support of Defendant Robert Ladd's Motion to Compel a Rule 30(b)(6) deposition and the Memorandum of Law in Support. I have personal knowledge of the facts below and, if called as a witness, I could and would testify competently thereto.

3. Attached hereto as Exhibit A is a true and correct copy of Mr. Ladd's Notice of Rule 30(b)(6) Topics Directed to Plaintiff Securities and Exchange Commission, dated January 13, 2020.

4. Attached hereto as Exhibit B is a true and correct copy of email correspondence with counsel for Plaintiff Securities and Exchange Commission, dated January 27, 2020.

Dated the 4th day of May 2020.

/s/ Randall R. Lee
Randall R. Lee